

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Civil Action No. 2:25CV704

A GLOCK 17 9MM PISTOL, MAGAZINE,
AND ASSOCIATED AMMUNITION,

Defendants.

VERIFIED COMPLAINT IN FORFEITURE

AND NOW comes the United States of America, by and through its counsel, Troy Rivetti, Acting United States Attorney for the Western District of Pennsylvania, and Jill L. Locnikar, Assistant United States Attorney for the Western District, and respectfully represents as follows:

1. Plaintiff, the United States of America, brings this civil action *in rem* for the forfeiture to the United States of a Glock 17 9mm Pistol, bearing serial number YCL923, magazine, and associated ammunition, delineated by asset identification number 25-FBI-000646, (hereinafter the “Defendant Property”) pursuant to 21 U.S.C. § 881(a)(11).

2. Jurisdiction is predicated upon 28 U.S.C. §§ 1345 and 1355.

3. Venue is proper under 28 U.S.C. §§ 1395 and 1355.

4. During September 2024, the Federal Bureau of Investigation (“FBI”) received information from a Confidential Informant (“CI”) about heroin/fentanyl drug trafficking at 416 Charles Street, Turtle Creek, PA, 15145 (“the Seizure Address”). The CI had purchased heroin/fentanyl from the alleged drug traffickers. Investigators then identified members of a known street gang, which included Alonzo Griffin, Jr. (“Griffin”) and Troy Brown, Jr. (“Brown”),

using the Seizure Address.

5. Pursuant to the CI's information, law enforcement utilized surveillance and other investigative techniques to further the investigation.

6. Drug traffickers commonly store their drug inventory, drug paraphernalia, drug proceeds, and drug records at their residence or at the residence of a relative or other trusted associate, generally referred to as a "stash house." Additionally, drug traffickers possess firearms, ammunition, and other dangerous weapons to protect their proceeds, product, and person from others who might attempt to rob them, and to enforce payment from their customers. Drug traffickers will store firearms, ammunition, and other dangerous weapons within their private residence and at "stash houses." Investigators met with the Allegheny County District Attorney's Narcotics Enforcement Team ("DANET") and provided information that Griffin and Brown utilized the Seizure Address as a "stash house" for distribution of controlled substances.

7. DANET investigators observed Griffin and Brown frequenting known locations relevant to their investigation. On October 24, 2024, investigators utilized electronic surveillance to identify Griffin's vehicle traveling from 871 Sylvan Avenue, North Versailles, PA, 15137 to the Seizure Address. As Griffin's vehicle was observed arriving at the Seizure Address, Brown was observed removing a heavily weighted, white shopping style bag from the trunk. The contents of the bag looked to be square in appearance, resembling that of a packaged kilogram of controlled substance and/or prepacked "bricks" of heroin/fentanyl. Brown was observed carrying the white grocery style bag into the rear entrance of the Seizure Address.

8. Investigators observed Griffin and Brown entering and exiting the rear entrance of the Seizure Address, entering Griffin's vehicle, and departing the area.

9. During November 2024, investigators observed Griffin and Brown arrive at the Seizure Address. Investigators saw Brown exit the passenger's position of Griffin's vehicle and

enter the rear of the seizure address. They observed Griffin exit the operator's position and carry a heavily weighted black backpack¹ into the rear of the Seizure Address. Later, investigators saw Griffin and Brown exit the rear of the Seizure Address and saw Griffin carry the previously identified black backpack to his vehicle.

10. On the same date, investigators coordinated a controlled purchase with Griffin. The CI provided investigators with the narcotics obtained from Griffin and stated Griffin removed the narcotics from a black backpack and placed the proceeds into the black backpack. Due to risk of exposure, investigators did not conduct a field test. However, based on investigators' training and experience in drug identification and packaging, and knowledge of the investigation, the controlled substance was consistent with packaged bulk fentanyl and/or heroin.

11. On November 13, 2024, a federal search warrant was executed on the Seizure Address. Investigators located and seized evidence of illegal narcotics trafficking. Law enforcement seized suspected fentanyl, unknown pills, suspected cocaine, suspected crack, various weapons including the Defendant Property, various ammunition, and currency. A field test was conducted on a portion of the items seized and revealed a positive result for fentanyl/xylazine, cocaine, and cocaine base.

12. The Defendant Property has remained in the Western District of Pennsylvania in the custody of FBI.

13. After the seizure of the Defendant Property, the FBI instituted administrative forfeiture proceedings pursuant to 21 U.S.C. § 881(a)(11) since the Defendant Property was used in furtherance of Griffin's and Brown's narcotics trafficking in violation of 21 U.S.C. § 841. During the administrative proceedings, Kolbrin Evander Holyfield filed a claim to the Defendant

¹ Investigators previously identified the black backpack during controlled purchase and surveillance operations.

Property. As a result, the United States has instituted this civil forfeiture action against the Defendant Property.

14. By reason of the foregoing, and under the provisions of 21 U.S.C. § 881 (a)(11), the Defendant Property is forfeitable to the United States.

WHEREFORE, the United States of America respectfully requests that process of warrant *in rem* issue for the arrest of the Defendant Property; that Judgment of Forfeiture be entered in favor of the United States for the Defendant Property; and that the United States be granted such relief as this Honorable Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted,

TROY RIVETTI
Acting United States Attorney

By: /s/ Jill L. Locnikar
Assistant U.S. Attorney
700 Grant Street, Suite 4000
Pittsburgh, PA 15219
(412) 644-3500
PA ID #85892 (AFF)

VERIFICATION

I am a Special Agent with the United States the Federal Bureau of Investigation, and the case agent assigned the responsibility for this case. I have read the contents of the foregoing complaint for forfeiture and the statements contained therein are true and correct to the best of my knowledge and belief.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on this 22 day of May, 2025.

A handwritten signature in blue ink, appearing to read 'Daniel Gramc', is written over a horizontal line.

Daniel Gramc, Special Agent,
Federal Bureau of Investigation